

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION**

TAMEKA WORDLOW and
JASON LEGRONE,

Plaintiffs,

VS.

STATE FARM INSURANCE,

Defendant.

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Docket No.
JURY DEMANDED

NOTICE OF REMOVAL

Defendant State Farm Insurance hereby notifies the Judges of the United States District Court for the Western District of Tennessee, the clerk of the Circuit Court of Shelby County, Tennessee and Plaintiffs, Tameka Wordlow and Jason LeGrone, that the action described herein and filed in the Circuit Court of Shelby County, Tennessee, is removed to the United States District Court for the Western District of Tennessee, Western Division pursuant to 28 U.S.C. § 1441.

1. On January 19, 2011, Plaintiffs Tameka Wordlow and Jason LeGrone, filed a civil action bearing Docket No. CH - 11-0095-2, against the Defendant, State Farm Insurance, in the Circuit Court of Shelby County, Tennessee. Service of the complaint and summons was made upon the Corporation Service Company for the Defendant on January 27, 2011, by certified mail through the Department of Insurance of the State of Tennessee.

2. This action is filed by Plaintiffs for proceeds allegedly due under a contract of insurance written by Defendant, State Farm Insurance, insuring Plaintiff's personal property and contents in Shelby County, Tennessee, which property was

allegedly damaged or stolen on or about August 25, 2009. Plaintiffs also make claims of statutory bad faith and violation of the Tennessee Consumer Protection Act.

3. Petitioner seeks removal of this action to this Court upon the grounds that the controversy is wholly between citizens of different states and involves an amount in controversy which exceeds Seventy-five Thousand Dollars (\$75,000.00), exclusive of the interest and costs, 28 U.S.C. § 1332. Specifically, the complaint prays for judgment in the amount of One Hundred Thousand Dollars (\$100,000.00) plus penalties for Bad Faith and treble damages for violation of Tennessee Consumer Protection Act.

4. Plaintiffs are residents and citizens of the State of Tennessee and were citizens of the State of Tennessee at the time of the filing of this action and at the time of removal. Defendant, State Farm Insurance Company, is a corporation incorporated in Connecticut, with its principal place of business in Bloomington, Illinois, McLean County. The amount in controversy exceeds Seventy-Five Thousand Dollars (\$75,000.00), exclusive of interest and costs.

5. This notice is filed within the time prescribed by 28 U.S.C. §1446(b).

6. A copy of the Summons and Complaint, being all the papers served upon the Defendant, is attached hereto.

WHEREFORE, Notice is hereby given that the said civil action number CH-11-0095-2 is removed from the Circuit Court of Shelby County, Tennessee, to this Court.

Respectfully submitted,

RAINEY, KIZER, REVIERE & BELL, P.L.C.

s/Russell E. Reviere
Russell E. Reviere (07166)
Attorney for Defendant
209 East Main Street
P. O. Box 1147
Jackson, TN 38302-1147
(731) 423-2414

CERTIFICATE OF SERVICE

The undersigned certifies that a true copy of this pleading or document was served upon: Michael R. Campbell and Stephen A. Sauer, Attorneys At Law, 8 So. 3rd Street, 4th Floor, Memphis, TN 38103 counselor of record for Plaintiffs, and by electronic means via the Court's electronic filing system.

This the 18th day of February, 2011.

s/ Russell E. Reviere